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April 30, 2019

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ADEC
Air Permits Program
610 University Avenue
Fairbanks, Alaska 99709-3643
ATTN: Compliance Technician

Subject: Operating Report – First Quarter 2019
Kuparuk Central Production Facility No.1
Permit No. AQ0267TVP01 Rev. 2, 8 August 2007
CPF-1 Standby Generators AQ0267MSS07, 31 October 2014

Enclosed are the original and two copies of the ConocoPhillips Alaska, Inc. (COPA) Operating Report (OR) for the quarter ending March 31, 2019, as required by the referenced Air Quality Operating Permit for the Kuparuk Central Production Facility #1 (CPF-1). Reporting required by CPF1 Emergency Generators Project under Air Quality Minor Permit No. AQ0267MSS07 is included in this submittal.

In a routine audit, fuel use errors were discovered for EU IDs 58, 59, 61, and 62. Errors occurred in November and December 2016 and June, October, and December 2017. See Attachment 8 for fuel use corrections.

In a routine audit, an error was found on the 1E-1J Operator Venting Logsheet submitted for June 2018. See Attachment 9 for the corrected Logsheet.

On March 12, 2019, corrections to the 2018 third quarter and fourth quarter operating reports were submitted to the Department. Those materials are not included in this submittal however this notation is intended to record the submittal activity during the reporting period.

If you have any questions or need additional information regarding this report, please contact us at n1037@conocophillips.com or by phone at (907) 659-7242.

Sincerely,

Brad Broker/Catie Coursen
Environmental Coordinator

Attachments

cc: Compliance Technician, Fairbanks

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I. Certification

Permit Number: Air Quality Operating Permit No. AQ0267TVP01 Rev. 2, August 8, 2007

Operating Report: First Quarter 2019; January 1 through March 31

Statement of Certification

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

I certify that Emission Units 1 through 3, 10, 11, 14, 16, 17, and 37 through 50 burned only gas as fuel for this reporting period.

Signature:



Dennis Melton/Scott Fahrney
CPF1 and CPF2 Operations Superintendent

Date:

4/27/19

II. Source Identification and Location

ConocoPhillips Alaska, Inc.
700 G Street (zip 99501)
P.O. Box 100360
Anchorage, AK 99510-0360

Stationary Source Name: Central Production Facility #1 (CPF-1)

Location: Kuparuk Oil Field

UTM Coordinates: Northing 7803800, Easting 402000, Zone 6

Township and Range: Section 9, T11N, R10E (Production Pad)
Sections 16 & 21, T11N, R10E (DS1E)
Section 35, T11N, R10E (DS1J)
Umiat Meridian

Permit Number: Air Quality Operating Permit No. AQ0267TVP01 Rev. 2

III. Permit Requirements and Compliance Documentation

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
Section 5. Emission Unit-Specific Requirements		
3.3, 98, 99	If any of EU IDs 19 through 28 operate (for emergencies or non-emergencies) for more than the number of hours stated in Condition 3.3, perform a Method 9 visible emission observation. Include a summary of results of all Method 9 readings in the OR.	No Method 9 opacity readings required. Units 19 through 28 operated for less than the number of hours (140 hours for Units 19 and 20 and 400 hours for Units 21 through 28) stated in Condition 3.3.
3.4, 98, 99	If any of EU IDs 4 through 9, 12, 13, 15, and 18 operate on liquid fuel for more than 400 hours in a calendar year perform a Method 9 visible emission observation while firing liquid fuel. Include a summary of results of all Method 9 readings in the OR.	No Method 9 opacity readings required. Units 4 through 9, 12, 13, 15, and 18 operated on liquid fuel for less than 400 hours stated in Condition 3.4.
3.5, 102	For EU IDs 29 through 34 (flares), monitor, record and report the first six daylight flare events during the life of the permit.	For EU ID 29 through 33 Flares, six daylight flare events have been observed: one on 18 July 2003, three on 28 July 2004; one on 16 Sep 2005; and one on 4 Aug 2006. Portable Flare EU ID 34 (Tag No. PF1) is neither operated nor present in the Kuparuk Field and thus not included in the ORs.
3.6, 98, 99	For EU IDs 35 and 36 (incinerators), perform a Method 9 visible emission observation once per calendar year. Include a summary of results of all Method 9 readings in the OR.	A Method 9 observation was not conducted for EU 35 during the reporting period. EU ID 36 did not operate during the reporting period and was physically removed 10 October 2018. Refer to Section IV.
3.8, 98, 99	If any rig camp engine (EU ID 60) is no longer a nonroad engine and combusts more than 13,500 gallons of fuel per consecutive 12-month period, perform a Method 9 visible emission observation. Include a summary of results of all Method 9 readings in the OR.	There were no rig camp engines that qualified under this permit or this condition.
5.1a, 32.4, 32.7	When using liquid fuel from a North Slope topping plant in EU IDs 1 - 34, 37- 50, 59, and 60, include a list of the sulfur contents measured for each month covered by the report in the OR. Report changes to fuel supplier/ source to EPA Region 10.	See Attachment 1. There were no changes to the liquid fuel supplier or source.
5.1d	When using liquid fuel from a North Slope topping plant with a sulfur content greater than 0.75% by weight, include the calculated SO ₂ emissions in ppm in the OR.	There was no liquid fuel with sulfur content greater than 0.75% by weight used during this reporting period.

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
5.2b, 5.2d, 9.3, 32.1, 32.4	For fuel gas, submit records of fuel sulfur content standard analyses. 1. Demonstrate that fuels meet definition of natural gas; or 2. Monitor total sulfur fuel content using approved method from NSPS Subpart GG. OR 3. If a demonstration is not made that the fuel meets the definition of natural gas, then the sulfur content of the fuel may be determined semi-annually using an analytical method approved by EPA in a custom fuel monitoring plan/schedule. Include copies of the records with the OR.	See the reported monthly H2S fuel gas content analyzed by ASTM Method D4810 in Attachment 1.
BACT Emission Limits		
6.2	For EU ID 1-3 and 8-13, report monthly and consecutive 12-month period sum of NO _x , SO ₂ , CO, PM, and VOC emissions, for each month of the reporting period, with the OR.	See Attachment 3.
7.2	For EU ID 16, 37-41, 43-45, and 48-50, report monthly and consecutive 12-month period summation of NO _x , SO ₂ , CO, and PM emissions, for each month of reporting period, with the OR.	See Attachment 3.
8.2	For EU ID 36, report monthly and consecutive 12-month period summation of NO _x , SO ₂ , CO, PM and VOC emissions, for each month of reporting period, with the OR.	See Attachment 3.
9.2, 31.6	If EU ID 14 is tested or represented by testing at less than maximum load and for which the load must be limited under Condition 31.4c, include the information required in Condition 31.6.a(i) – (iii) in the OR.	EU ID 14 GE Frame 6 Gas Turbine Electric Generator was tested on August 8-9, 2018 at loads up to 81% based on prevailing ambient conditions. No load limits resulted.
Fuel Consumption Monitoring for EU IDs 1-50, and 58-63		
10.4	For each emission unit group (turbines, heaters, engines, flares, incinerators, drill site heaters, drill rig engines, drill rig heaters and boilers, rig camp engines, well service heaters, well service engines, and well frac unit engines), report the monthly total fuel consumption for each fuel type (MMscf/month and/or gallons/month) and the stationary source total fuel consumption, for each month covered by the reporting in the OR.	See Attachment 3.
10.5, 18.1	Report the 12-consecutive month total fuel consumption (MMscf or gallons) for each emission unit group described by EU IDs 34 and 58-63 for each month of the reporting period in the OR.	See Attachment 2 for EU ID 58-63. Portable Flare EU ID 34 (Tag No. PF1) is neither operated nor present in the Kuparuk Field and thus not included in the OR.

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
10.6, 15.1, 16.1, 17.1, 18.1	Report maximum total daily fuel use EU ID 34, 58, 61 and 62 combined, and 63 for each month covered by the reporting period in the OR.	Portable Flare EU ID 34 (Tag No. PF1) is neither operated nor present in the Kuparuk Field and thus not included in the OR. For EU ID 58, 61 and 62, see Attachment 2.
Hours of Operation Monitoring for Fuel-Fired Emission Units		
11.1, 11.3	For each of EU ID 1-18 and 35-50, report the monthly operating time in the OR.	See Attachment 2.
11.2, 11.3	For EU ID 4-9, 12, 13, 15, and 18, report the monthly operating time separately for fuel gas and liquid fuel firing, and the calendar year total liquid fuel operating time in the OR.	See Attachment 2.
Fuel Gas Hydrogen Sulfide Content Limit		
12.2	For EU ID 1-18 and 29-50, report the monthly and rolling 12-month average fuel gas H ₂ S concentration, for each month of the reporting period, with the OR.	See Attachment 3.
Liquid Fuel Sulfur Content Limit		
13.1, 32.4	Report the liquid fuel sulfur content in the OR.	See Attachment 1.
NOx Monitoring, Recordkeeping, and Reporting for NSPS Subpart GG Turbines		
31.6a	For turbines (EU IDs 1-3 and 10-13) that are subject to load limits to comply with NSPS Subpart GG and/or BACT emission limits, list each turbine tested or represented by testing at less than maximum load and for which the load must be limited (by Condition 31.4c) include the following information in the OR. 1) The load limit; 2) The turbine identification; and 3) The highest load recorded as part of the recordkeeping requirements.	None of the turbines listed in Condition 31.6 is limited by testing results as described in Condition 31.4. This condition was not triggered during the operating period.
31.6b	For each turbine subject to NSPS Subpart GG and/or BACT emission limits (EU IDs 1-3 and 10-13) that has not been required to conduct periodic source testing because it normally operates less than 400 hours in any 12 months, but has now operated more than 400 hours in a 12-month period ending during the reporting period, identify in the OR: 1) the turbine, 2) The highest number of operating hours for any 12 months ending during the period covered by the report, and 3) Any turbine that operated 400 or more hours.	This condition was not triggered for the affected turbines during the operating period.
32.4	Submit a summary of the sulfur analysis analytical results taken to comply with the fuel sulfur content standard (see Condition 5.2d above) with each OR.	See Attachment 1.

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
Section 7. Owner Requested Limits (ORL)		
Operating Hours of Emergency Liquid fuel-fired Engines		
37.2	For EU ID 19-28, report the monthly and consecutive 12-month period operating time for each emission unit in the OR.	See Attachment 2.
ORL for Emission Unit 16 to avoid exceeding 43 MMBtu/hr firing rate		
38.3	For EU ID 16, report the maximum daily average fuel consumption rate for each month in the OR.	See Attachment 2.
Limits to Avoid Classification as PSD Major		
39.2	For EU ID 1-3, report the 12-consecutive month period summation of NO _x emissions from these emission units, combined, for each month in the OR.	See Attachment 3.
40.1	For EU ID 42, 46, and 47, report the make and rating of each production heater in the next OR following initial startup of each unit.	Documentation submitted to ADEC April 21, 2006 in the First Quarter 2006 Operating Report.
41.5	For EU ID 34, 42, 46, 47, and 59, report the 12-consecutive month SO ₂ emissions for these emission units, combined, for each month of the reporting period, with each OR.	Portable Flare EU ID 34 (Tag No. PF1) is neither operated nor present in the Kuparuk Field and thus not included in the OR. See Attachment 3.
42.3	For EU ID 56, include with each OR: a) Monthly estimated VOC emissions from these tanks at DS1E and DS1J and the 12 consecutive month VOC emissions, for each month in the reporting period;	See Attachment 3.
42.3	For EU ID 56, include with each OR: b) Input and output from simulation models and software used to estimate VOC emissions; and c) All calculations and assumptions used to estimate VOC emissions.	See Attachment 7.
ORL for Incinerators to avoid stationary source classification as "HAPs major"		
43.2	For EU IDs 35 and 36, report the monthly and consecutive 12-month total summation of solid waste throughput for each month in the OR.	See Attachment 2.
44.3	For EU ID 36, report the monthly maximum hourly average charging rates (lb/hr) in the OR.	See Attachment 2.
Section 10. Insignificant Emission Units		
54.3	For any of EU IDs 19-28 that have exceeded the IEU threshold of 18 AAC 50.326(e), or any of EU IDs 61-63 that have exceeded the IEU threshold of 18 AAC 50.326(f)(85), or any EU at the stationary source that has actual emissions greater than the IEU emissions thresholds,	This condition was not triggered in this reporting period.

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
	include documentation of the emission unit emissions in the OR.	
Section 11. Generally Applicable Requirements		
61.5	Include summary information regarding any exclusion zone violations in the OR.	This provision was not triggered in this reporting period.
70.5	Include a summary report about emissions complaints with the OR which includes: <ol style="list-style-type: none"> 1. Number of complaints received; 2. Number of times COPA or ADEC found corrective action necessary; 3. Number of times corrective action was taken within 24 hours; and 4. Status of corrective action COPA or ADEC found necessary that were not taken within 24 hours. 	No complaints were received in this reporting period.
Section 13. General Recordkeeping, Reporting, and Compliance Certification Requirements		
87.1	Attach a copy of any NSPS and NESHAPs reports submitted to EPA Region 10 with the OR unless copies have already been provided to ADEC at time of submittal.	All reports submitted to EPA were provided to ADEC at the time they were submitted to EPA.
88.2a	If excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify: <ol style="list-style-type: none"> 1. Date of the deviation; 2. Equipment involved; 3. The permit condition affected; 4. A description of excess emissions or permit deviation; and 5. Any corrective action or preventive measures taken and the date 	See Section VI of this report and Attachment 4 for excess emissions or permit deviations not previously submitted during the applicable reporting period.
Section 16. Visible Emissions and PM Monitoring, Recordkeeping and Reporting		
98.2	If EU IDs 4-9, 12, 13, 15, 18, 19-28, 60, 35 or 36 trigger Condition 98.1, include a summary of the results of all Method 9 readings conducted during the reporting period in the OR.	This condition was not triggered in this reporting period.
99.2	For EU IDs 4-9, 12, 13, 15, 18, 19-28, 60, 35 if Method 9 readings require corrective actions, submit a written record showing the starting date, completion date, and description of any actions taken to reduce visible emissions with each OR.	This condition was not triggered in this reporting period.
Federal Requirements not included in the Permit - Compression Ignition RICE Subject to NESHAP Subpart ZZZZ		
	For EUs 22-28 include in the OR a report of Subpart ZZZZ deviations as defined in 40 C.F.R. 63.6675 and of each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A (Table 8 of Subpart ZZZZ) was not met.	This condition was not triggered in this reporting period. There were no Subpart ZZZZ deviations during the reporting period. See Section IX.

IV. Fuel Sulfur Content and Visible Emissions Observations

Condition 5.1.a: Liquid Fuel Sulfur Content

The Kuparuk River Unit began using Ultra Low Sulfur Diesel in accordance with the *North Slope Ultra Low Sulfur Diesel Transition Agreement* on January 1, 2009. Under this agreement, non-road engines are fueled with ULSD, while heaters and boilers are primarily fueled with Kuparuk Low End Point Diesel (though these too may occasionally be fueled with ULSD). ULSD was supplied by the Tesoro Refinery. Deliveries were provided by Colville Services up until January 23, 2019 after which Northern Oilfield Solutions provided delivery.

COPA collects and analyzes representative samples of ULSD and LEPD each month. Laboratory reports documenting the sulfur analysis appear as Attachment 1 to this report. Diesel is sampled at the CPF-1 ULSD Imported Product Tank No. 504 and LEPD Product Tank No. 501.

Condition 5.2 and 32.1: Fuel Gas Sulfur Content

An analytical report for monthly fuel gas H₂S is included as Attachment 1. In addition, the emission summary reports in Attachment 3 include a mean value for fuel gas H₂S which may be slightly different than the lab sample value. The reason for this difference is that the mean value reflects a daily average calculated from the previous month and current month samples.

Condition 3.6, 98.2, 99.2, 102: Results of the annual visible emission surveillance conducted during the reporting year are listed below.

ID	Tag No.	Description	Date of Reading	Permit Stipulation	Initials of Reader	Minimum Reading %	Maximum Reading %	Average Opacity

V. Hours of Operation, Fuel Type, Fuel Consumption and Applicable Operating Parameters for Period

Due to the requirement to report all quantities, even if zero, all regulated emission units are listed where required. All blanks indicate that applicable fuel use is not possible or that reporting is not required. Operating hours, fuel type, fuel consumption and applicable operating parameters are in Attachment 2.

Condition 10.4 of the permit requires reporting of monthly fuel use for each emission unit group, as well as the stationary source total fuel use for each month. The table in Attachment 3 presents the monthly liquid and fuel gas usage for each group and the total for the stationary source for this operating period.

VI. Dates of Excess Emission and Permit Deviation Reports which have already been filed with ADEC for Period

Condition 88.2.b: The permittee may cite report dates if already submitted to the department. Copies of these reports are provided in Attachment 5.

- March 12: Permit Deviation for lacking supporting information for EU 56.
- March 12: Permit Deviation for reporting deviation in 4Q18 Operating Report.

VII. Record of Complaints for Reporting Period

No complaints were received during this reporting period.

VIII. Additional Reporting Required by AQ0267MSS07 (issued 31 October 2015)

<u>Condition Number</u>	<u>Requirement</u>	<u>Compliance Documentation</u>
5.2	For EU ID 69 and 70, attach a copy of the certified manufacturer guarantee or a copy of the observation records to the operating report.	EU ID 69 and 70 became fully operational on 5 May 2016. EU ID 69 and 70 were observed on 28 May 2016.
7.2	After installation of EU ID 69 and 70, affirm that the exhaust stack from the EU complies with vertical, uncapped exhaust.	EU ID 69 and 70 exhaust stacks are vertical and uncapped.

IX. Deviation Reporting for NESHAP Subpart ZZZZ

No Subpart ZZZZ deviations during this reporting period.

Attachment 1

Monthly Laboratory Analysis Results for Liquid Fuel and Fuel Gas Sulfur Content

KUPARUK LABORATORY ANALYTICAL REPORT

Kuparuk Title V Air Quality Report
January 2019

Report Date: 2/5/19

To: NSK Environmental

Hydrogen Sulfide in Fuel Gas			H2S		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190105-00293	CPF-1 Frame 6 Fuel Gas H2S	1/5/2019	130	ppm	ASTM D4810-06	Monthly
S-190105-00294	CPF-1 Lift Gas H2S	1/5/2019	140	ppm	ASTM D4810-06	Monthly
S-190105-00295	CPF-2 Fuel Gas H2S	1/5/2019	80	ppm	ASTM D4810-06	Monthly
Multiple	CPF-3 Fuel Gas H2S	Multiple	199	ppm	ASTM D4810-06	Time-weighted Average for the Month
S-190105-00244	STP Fuel Gas H2S	1/5/2019	220	ppm	ASTM D4810-06	Monthly
S-190105-00245	STP DA Off-gas H2S	1/5/2019	0	ppm	ASTM D4810-06	Monthly

ULSD Imported Product Tank 801/902			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190116-00109	ULSD Imported Product Tank 801/902	1/12/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

Kuparuk LEPD			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190114-00245	KUTP Tank 501 Low End Point Diesel	1/14/2019	1067.5 0.11	ppm Weight %	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

CPF2 Tank 4201			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190111-00230	CPF2 T-4201 Monthly Diesel	1/6/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Monthly

Note: NA- Not analyzed

Contact NSK Environmental group for copies of this report

**KUPARUK LABORATORY
ANALYTICAL REPORT**

Kuparuk Title V Air Quality Report

February 2019

Report Date: 3/3/19

To: NSK Environmental

Hydrogen Sulfide in Fuel Gas			H2S		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190202-00309	CPF-1 Frame 6 Fuel Gas H2S	2/2/19	125	ppm	ASTM D4810-06	Monthly
S-190202-00308	CPF-1 Lift Gas H2S	2/6/19	140	ppm	ASTM D4810-06	Monthly
S-190202-00310	CPF-2 Fuel Gas H2S	2/2/19	100	ppm	ASTM D4810-06	Monthly
S-190202-00230	CPF-3 Fuel Gas H2S	2/2/19	200	ppm	ASTM D4810-06	Monthly
S-190202-00231	STP DA Off-gas H2S	2/2/19	0	ppm	ASTM D4810-06	Monthly
S-190202-00232	STP Fuel Gas H2S	2/2/19	200	ppm	ASTM D4810-06	Monthly

ULSD Imported from Colville			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190224-00142	ULSD Imported Product Tank 801/901	2/23/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

ULSD Imported from NOSI			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190228-00296	ULSD Imported Product from NOSI	2/27/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

Kuparuk LEPD			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190225-00111	KUTP Tank 501 Low End Point Diesel	2/25/2019	1090.62	ppm	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month
			0.11	Weight %		

CPF2 Tank 4201			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190204-00256	CPF2 T-4201 Monthly Diesel	2/4/2019	3.42	ppm	ASTM 7039-07 or ASTM D2622-10	Monthly

Note: NA- Not analyzed

Contact NSK Environmental group for copies of this report

KUPARUK LABORATORY ANALYTICAL REPORT

Kuparuk Title V Air Quality Report
March 2019

Report Date: 4/3/19

To: NSK Environmental

Hydrogen Sulfide in Fuel Gas			H2S		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190304-00307	CPF-1 Frame 6 Fuel Gas H2S	3/4/2019	130	ppm	ASTM D4810-06	Monthly
S-190304-00308	CPF-1 Lift Gas H2S	3/4/2019	130	ppm	ASTM D4810-06	Monthly
S-190304-00309	CPF-2 Fuel Gas H2S	3/4/2019	100	ppm	ASTM D4810-06	Monthly
S-190302-00289	CPF-3 Fuel Gas H2S	3/2/2019	210	ppm	ASTM D4810-06	Monthly
S-190302-00287	STP DA Off-gas H2S	3/2/2019	0	ppm	ASTM D4810-06	Monthly
S-190302-00288	STP Fuel Gas H2S	3/2/2019	220	ppm	ASTM D4810-06	Monthly

ULSD Imported from NOSI			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
Multiple	ULSD Imported Product from NOSI	3/17/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

Kuparuk LEPD			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
Multiple	KUTP Tank 501 Low End Point Diesel	3/4/2019	1109.7 0.11	ppm Weight %	ASTM 7039-07 or ASTM D2622-10	Highest value recorded for month

CPF2 Tank 4201			Sulfur Content		Reference	Notes
LIMs#	Sample location	Date	Result	Units		
S-190304-00125	CPF2 T-4201 Monthly Diesel	3/3/2019	< 3	ppm	ASTM 7039-07 or ASTM D2622-10	Monthly

Note; NA- Not analyzed

Contact NSK Environmental group for copies of this report

Attachment 2

Hours of Operation, Fuel Type, Fuel Consumption and Applicable Operating Parameters by Month

ConocoPhillips Alaska, Inc.
CPF1 Monthly Facility Operating Report
CPF1 Title V Permit # 267TVP01
January 2019

No.	Tag No.	Rating/Service	Vendor/Model	Fuel Gas (hrs)	Fuel Used (MMSCF)	Diesel (hrs)	Diesel (Gal)	YTD Diesel (hrs)	12 Month Diesel (hrs)	Non-Emerg (hrs)	12 Month non-Emerg (hrs)	Emerg (hrs)	12 Month Emerg (hrs)
Group I - Gas Turbines													
1	C-2101-A	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	744.0	109.0								
2	C-2101-B	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	347.7	46.03								
3	C-2101-C	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	744.0	101.4								
4	G-201-A	4.9 MHP/Electric Generator	Ruston/TB5000	744.0	27.50	0.00	0.00	0.00	0.00				
5	G-201-B	4.9 MHP/Electric Generator	Ruston/TB5000	0.00	0.00	0.00	0.00	0.00	0.00				
6	G-201-C	4.9 MHP/Electric Generator	Ruston/TB5000	744.0	27.85	0.00	0.00	0.00	0.00				
7	G-201-D	4.9 MHP/Electric Generator	Ruston/TB5000	744.0	28.03	0.00	0.00	0.00	0.00				
8	G-3201-E	4.9 MHP/Electric Generator	Ruston/TB5000	555.0	19.73	0.00	0.00	0.00	0.00				
9	G-3201-F	4.9 MHP/Electric Generator	Ruston/TB5000	334.7	1.07	0.00	0.00	0.00	0.00				
10	P-2202-A	5.4 MHP/Water Injection Pump	Ruston/TB5400	740.4	32.35								
11	P-2202-B	5.4 MHP/Water Injection Pump	Ruston/TB5400	560.3	23.06								
12	P-CL07-A	5.4 MHP/Water Injection Pump	Ruston/TB5400	744.0	29.56	0.00	0.00	0.00	0.00				
13	P-CL07-B	5.4 MHP/Water Injection Pump	Ruston/TB5400	692.8	28.50	0.00	0.00	0.00	0.00				
14	G-3203	53.5 MHP/Electric Generator	GE/Frame 6	744.0	250.7								
Group I SUBTOTALS				8137.84	726.7	0.00	0.00	0.00	0.00				
Group II - Fired Heaters													
15	H-201	27.8 MMBTU/hr Emergency Bid Heater	Broach	0.00	0.00		0.00	0.00	0.00				
16	G1-14-01	44.4 MMBTU/hr KUTP Heater	Born	744.00	21.13	Max Dly Avg = 0.0291 MMSCF/hr							
16	G1-14-01	44.4 MMBTU/hr KUTP Heater (FBU FG)	Born	0.00	0.00								
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater	Kvaerner Process	744.00	1.20								
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater (FBU FG)	Kvaerner Process	0.00	0.00								
18	H-102A	4.375 MMBTU/hr Air Heater	ICE MFG Ltd.	0.00	0.00	0.00	0.00	0.00	0.00				
Group II SUBTOTALS				1488.00	22.330	0.00	0.00	0.00	0.00				
Group III - Diesel Fired Equip													
19	G-701-A	1086 HP Emergency Generator	Waukesha			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	G-701-B	1086 HP Emergency Generator	Waukesha			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	P-CL04-ECC	215 HP Water Booster Pump	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	P-1A02	240 HP Freeze Protect Pump (1A)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	P-1F02	240 HP Freeze Protect Pump (1F)	Detroit Diesel			0.00	0.00	0.00	0.25	0.00	0.25	0.00	0.00
24	P-1G02	240 HP Freeze Protect Pump (1G)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	P-1L02	300 HP Freeze Protect Pump (1L)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	P-1Q02	300 HP Protect Pump (1Q)	Detroit Diesel			0.65	10.04	0.65	0.65	0.00	0.00	0.65	0.65
27	P-1R02	300 HP Protect Pump (1R)	Detroit Diesel			0.00	0.00	0.00	0.53	0.00	0.53	0.00	0.00
28	P-1Y02	300 HP Protect Pump (1Y)	Detroit Diesel			1.50	23.17	1.50	2.28	0.00	0.00	1.50	2.28
Group III SUBTOTALS						2.15	33.22	2.15	3.71	0.00	0.78	2.15	2.93
Group IV - Flares													
29	H-101B	East Flare Tip	McGill	99.08									
30	H-KF01	1-58 VS LP Flare Tip (Smokeless)	Kalder	644.92									
31	H-KF02	1-87 FS HP Flare Tip (Smokeless)	Kalder	644.92									
32	H-CR01A	West NGL Flare	McGill	0.00									
33	H-CR01B	East NGL Flare	McGill	744.00									
Group IV SUBTOTALS				2132.91	56.099								
Group V - Incinerators													
35	H-250	1300 lb/hr Incinerator	Compco	721.0	2.38								
36	H-347	900 lb/hr Incinerator	Compco	0.00	0.00								
Group V SUBTOTALS				721.00	2.38								
Group VI - Drill Site Heaters													
37	H-1A01	16.4 MMBTU/hr/Drill Site 1A Heater	Litaka	744.0	11.09								
38	H-1B01	16.4 MMBTU/hr/Drill Site 1B Heater	Litaka	744.0	11.09								
39	H-2V01	14.5 MMBTU/hr/Drill Site 1C Heater	CE NATCO	744.0	9.82								
40	H-3F01	19.6 MMBTU/hr/Drill Site 1D Heater	CE NATCO	744.0	13.24								
41	H-1E01	16.4 MMBTU/hr/Drill Site 1E Heater	Litaka	0.00	0.00								
42	H-1E02	30.0 MMBTU/hr/Drill Site 1E Heater	GTS Energy	744.0	1.83								
43	H-1F01	14.9 MMBTU/hr/Drill Site 1F Heater	BS&B	744.0	10.04								
44	H-1G01	14.9 MMBTU/hr/Drill Site 1G Heater	BS&B	744.0	10.04								
45	H-1F-1901	16.4 MMBTU/hr/Drill Site 1H Heater	Litaka	744.0	3.48								
46	H-1J01A	36.8 MMBTU/hr/Drill Site 1J Heater A	Petro Chem	744.0	8.25								
47	H-1J01B	36.8 MMBTU/hr/Drill Site 1J Heater B	Petro Chem	744.0	7.94								
48	H-1Q01	21.0 MMBTU/hr/Drill Site 1Q Heater	BS&B	744.0	14.21								
49	H-1R01	17.2 MMBTU/hr/Drill Site 1R Heater	BS&B	744.0	11.61								
50	H-1Y01	14.9 MMBTU/hr/Drill Site 1Y Heater	BS&B	0.00	0.00								
Group VI SUBTOTALS				8928.00	112.6								
FACILITY TOTALS					920.2		33.22						

Additional INCINERATOR INFORMATION

H-250 Monthly Solid Waste Throughput (tons): 562 12-months (tons): 576.6
H-347 Monthly Solid Waste Throughput (tons): 0.0 12-months (tons): 0.0
Maximum Monthly Charge Rate (lb/hr): 0.00

Based on the information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Date: 2/20/2019

Scott Fahrney

Reviewed by: Operations Superintendent - Printed Name

Scott Fahrney

Operations Superintendent - Signature

Original: Environmental

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ConocoPhillips Alaska, Inc.
CPF1 Monthly Facility Operating Report
CPF1 Title V Permit # 267TVP01
February 2019

No. Tag No.	Rating/Service	Vendor/Model	Fuel Gas (hrs)	Fuel Used (MMSCF)	Diesel (hrs)	Diesel (Gal)	YTD Diesel (hrs)	12 Month Diesel (hrs)	Non-Emerg (hrs)	12 Month non-Emerg (hrs)	Emerg (hrs)	12 Month Emerg (hrs)
Group I - Gas Turbines												
1	C-2101-A	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	662.7	94.09							
2	C-2101-B	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	672.0	84.23							
3	C-2101-C	16.3 MHP/Gas Lift Compressor	GE/Frame 3-K	672.0	89.33							
4	G-201-A	4.9 MHP/Electric Generator	Rustony/TB5000	672.0	25.26	0.00	0.00	0.00	0.00			
5	G-201-B	4.9 MHP/Electric Generator	Rustony/TB5000	5.92	0.17	0.00	0.00	0.00	0.00			
6	G-201-C	4.9 MHP/Electric Generator	Rustony/TB5000	672.0	25.48	0.00	0.00	0.00	0.00			
7	G-201-D	4.9 MHP/Electric Generator	Rustony/TB5000	672.0	25.72	0.00	0.00	0.00	0.00			
8	G-3201-E	4.9 MHP/Electric Generator	Rustony/TB5000	55.88	1.99	0.00	0.00	0.00	0.00			
9	G-3201-F	4.9 MHP/Electric Generator	Rustony/TB5000	9.58	0.24	0.00	0.00	0.00	0.00			
10	P-2202-A	5.4 MHP/Water Injection Pump	Rustony/TB5400	523.2	22.47							
11	P-2202-B	5.4 MHP/Water Injection Pump	Rustony/TB5400	646.1	27.00							
12	P-CL07-A	5.4 MHP/Water Injection Pump	Rustony/TB5400	672.0	26.43	0.00	0.00	0.00	0.00			
13	P-CL07-B	5.4 MHP/Water Injection Pump	Rustony/TB5400	671.5	28.27	0.00	0.00	0.00	0.00			
14	G-3203	53.5 MHP/Electric Generator	GE/Frame 6	672.0	212.6							
Group I SUBTOTALS				7228.91	663.3	0.00	0.00	0.00	0.00			
Group II - Fired Heaters												
15	H-201	27.8 MMBTU/hr Emergency Bld Heater	Brooch	0.00	0.00	0.00	0.00	0.00	0.00			
16	G1-14-01	44.4 MMBTU/hr KUTP Heater	Born	672.00	18.88	Max Day Avg = 0.0288 MMBTU/hr						
16	G1-14-01	44.4 MMBTU/hr KUTP Heater (PBU FG)	Born	0.00	0.00							
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater	Kvaerner Process	672.00	1.01							
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater (PBU FG)	Kvaerner Process	0.00	0.00							
18	H-102A	4.375 MMBTU/hr Air Heater	ICE MFG Ltd.	0.00	0.00	0.00	0.00	0.00	0.00			
Group II SUBTOTALS				1344.00	19.890	0.00	0.00	0.00	0.00			
Group III - Diesel Fired Equip												
19	G-701-A	1086 HP Emergency Generator	Waukesha		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	G-701-B	1086 HP Emergency Generator	Waukesha		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	P-CL01-ECC	235 HP Water Booster Pump	Detroit Diesel		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	P-1A02	240 HP Freeze Protect Pump (1A)	Detroit Diesel		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	P-1A02	240 HP Freeze Protect Pump (1F)	Detroit Diesel		0.00	0.00	0.00	0.25	0.00	0.25	0.00	0.00
24	P-1G02	240 HP Freeze Protect Pump (1G)	Detroit Diesel		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	P-1L02	300 HP Freeze Protect Pump (1L)	Detroit Diesel		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	P-1Q02	300 HP Protect Pump (1Q)	Detroit Diesel		0.00	0.00	0.65	0.65	0.00	0.00	0.65	0.65
27	P-1R02	300 HP Protect Pump (1R)	Detroit Diesel		0.00	0.00	0.00	0.53	0.00	0.53	0.00	0.00
28	P-1Y02	300 HP Protect Pump (1Y)	Detroit Diesel		0.00	0.00	1.50	2.28	0.00	0.00	0.00	2.28
Group III SUBTOTALS					0.00	0.00	2.15	3.71	0.00	0.78	0.00	2.93
Group IV - Flares												
29	H-101B	East Flare Tip	McGill	0.00								
30	H-KF01	1-58 VS LP Flare Tip (Smokeless)	Kalder	672.00								
31	H-KF02	1-87 FS HP Flare Tip (Smokeless)	Kalder	672.00								
32	H-CR01A	West NGL Flare	McGill	0.00								
33	H-CR01B	East NGL Flare	McGill	672.00								
Group IV SUBTOTALS				2016.00	48.035							
Group V - Incinerators												
35	H-250	1300 lb/hr Incinerator	Comptro	608.0	2.01							
36	H-347	900 lb/hr Incinerator	Comptro	0.00	0.00							
Group V SUBTOTALS				608.00	2.01							
Group VI - Drill Site Heaters												
37	H-1A01	16.4 MMBTU/hr/Drill Site 1A Heater	Lutoka	672.0	10.01							
38	H-1B01	16.4 MMBTU/hr/Drill Site 1B Heater	Lutoka	672.0	10.01							
39	H-2Y01	14.5 MMBTU/hr/Drill Site 1C Heater	CE NATCO	672.0	8.87							
40	H-3F01	19.6 MMBTU/hr/Drill Site 1D Heater	CE NATCO	672.0	11.96							
41	H-1E01	16.4 MMBTU/hr/Drill Site 1E Heater	Lutoka	0.00	0.00							
42	H-1E02	30.0 MMBTU/hr/Drill Site 1E Heater	GTS Energy	672.0	0.56							
43	H-1F01	14.9 MMBTU/hr/Drill Site 1F Heater	BSSB	672.0	9.07							
44	H-1G01	14.9 MMBTU/hr/Drill Site 1G Heater	BSSB	672.0	9.07							
45	H-1F-1901	16.4 MMBTU/hr/Drill Site 1H Heater	Lutoka	672.0	3.01							
46	H-1D01A	36.8 MMBTU/hr/Drill Site 1J Heater A	Petro Chem	671.0	8.11							
47	H-1D01B	36.8 MMBTU/hr/Drill Site 1J Heater B	Petro Chem	671.0	7.78							
48	H-1Q01	21.0 MMBTU/hr/Drill Site 1Q Heater	BSSB	672.0	12.84							
49	H-1R01	17.2 MMBTU/hr/Drill Site 1R Heater	BSSB	672.0	10.48							
50	H-1Y01	14.9 MMBTU/hr/Drill Site 1Y Heater	BSSB	0.00	0.00							
Group VI SUBTOTALS				6062.00	161.8							
FACILITY TOTALS					835.0	0.00						

Additional INCINERATOR INFORMATION

H-250 Monthly Solid Waste Throughput (tons): 39.5 12-months (tons): 574.1
H-347 Monthly Solid Waste Throughput (tons): 0.0 12-months (tons): 0.0
Maximum Monthly Charge Rate (lbs/hr): 0.00

Based on the information and data formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Date:

3/19/19

Reviewed by: Operations Superintendent - Printed Name

Scott Fahruy

Operations Superintendent - Signature
Original: Environmental

Scott Fahruy

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CPF1 Title V Permit # 267TVP01
March 2019

No.	Tag No.	Rating/Service	Vendor/Model	Fuel Gas (lbs)	Fuel Used (MMSCF)	Diesel (lbs)	Diesel (Gals)	YTD Diesel (lbs)	12 Month Diesel (lbs)	Non-Emerg (lbs)	12 Month Non-Emerg (lbs)	Emergency (lbs)	12 Month Emergency (lbs)
Group I - Gas Turbines													
1	C-2101-A	16.3 MHP/Gas UR Compressor	GE/Frame 3-K	412.8	59.35								
2	C-2101-B	16.3 MHP/Gas UR Compressor	GE/Frame 3-K	734.0	93.44								
3	C-2101-C	16.3 MHP/Gas UR Compressor	GE/Frame 3-K	731.5	95.12								
4	G-201-A	4.9 MHP/Electric Generator	Ruston/TB5000	743.0	25.23	0.00	0.00	0.00	0.00				
5	G-201-B	4.9 MHP/Electric Generator	Ruston/TB5000	145.7	5.17	0.00	0.00	0.00	0.00				
6	G-201-C	4.9 MHP/Electric Generator	Ruston/TB5000	743.0	26.62	0.00	0.00	0.00	0.00				
7	G-201-D	4.9 MHP/Electric Generator	Ruston/TB5000	692.5	24.98	0.00	0.00	0.00	0.00				
8	G-201-E	4.9 MHP/Electric Generator	Ruston/TB5000	0.00	0.00	0.00	0.00	0.00	0.00				
9	G-201-F	4.9 MHP/Electric Generator	Ruston/TB5000	96.25	3.62	0.00	0.00	0.00	0.00				
10	P-2202-A	5.4 MHP/Water Injection Pump	Ruston/TB5400	470.1	18.19								
11	P-2202-B	5.4 MHP/Water Injection Pump	Ruston/TB5400	584.2	21.39								
12	P-CL01-A	5.4 MHP/Water Injection Pump	Ruston/TB5400	743.0	29.61	0.00	0.00	0.00	0.00				
13	P-CL01-B	5.4 MHP/Water Injection Pump	Ruston/TB5400	743.0	31.02	0.00	0.00	0.00	0.00				
14	G-3203	53.5 MHP/Electric Generator	GE/Frame 6	743.0	230.7								
Group I SUBTOTALS				7532.07	664.4	0.00	0.00	0.00	0.00				
Group II - Fired Heaters													
15	H-201	27.8 MMBTU/hr Emergency Bld Heater	Brooks	0.00	0.00	0.00	0.00	0.00	0.00				
16	GI-14-01	44.4 MMBTU/hr KUTP Heater	Born	722.50	19.77	Net Dry Avg = 0.0034 MMBTU/hr							
16	GI-14-01	44.4 MMBTU/hr KUTP Heater (FBI FG)	Born	0.00	0.00								
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater	Kvaerner Process	742.25	1.14								
17	H-3204	9.7 MMBTU/hr Fuel Gas Heater (FBI FG)	Kvaerner Process	0.00	0.00								
18	H-100A	4.375 MMBTU/hr Air Heater	ICE HPG Ltd.	0.00	0.00	0.00	0.00	0.00	0.00				
Group II SUBTOTALS				1464.75	20.910	0.00	0.00	0.00	0.00				
Group III - Diesel Fired Equip													
19	G-701-A	1066 HP Emergency Generator	Waukesha			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	G-701-B	1066 HP Emergency Generator	Waukesha			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	P-CL01-BCC	215 HP Water Booster Pump	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	P-1A02	240 HP Freeze Protect Pump (1A)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	P-1B02	240 HP Freeze Protect Pump (1B)	Detroit Diesel			0.00	0.00	0.00	0.25	0.00	0.25	0.00	0.00
24	P-1C02	240 HP Freeze Protect Pump (1C)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	P-1D02	300 HP Freeze Protect Pump (1D)	Detroit Diesel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	P-1E02	300 HP Freeze Protect Pump (1E)	Detroit Diesel			0.00	0.00	0.65	0.65	0.00	0.00	0.00	0.65
27	P-1F02	300 HP Freeze Protect Pump (1F)	Detroit Diesel			0.00	0.00	0.00	0.53	0.00	0.53	0.00	0.00
28	P-1Y02	300 HP Freeze Protect Pump (1Y)	Detroit Diesel			0.00	0.00	1.50	2.28	0.00	0.00	0.00	2.28
Group III SUBTOTALS						0.00	0.00	2.15	3.71	0.00	0.78	0.00	2.91
Group IV - Flares													
29	H-101B	East Flare Tip	McGill	0.00									
30	H-KF01	1-58 VS LP Flare Tip (Smokeless)	Kalder	743.00									
31	H-KF02	1-87 VS LP Flare Tip (Smokeless)	Kalder	743.00									
32	H-CR01A	West NSL Flare	McGill	0.00									
33	H-CR01B	East NSL Flare	McGill	743.00									
Group IV SUBTOTALS				2229.00	49.330								
Group V - Incinerators													
35	H-250	1300 lb/hr Incinerator	Compro	992.0	1.95								
36	H-347	900 lb/hr Incinerator	Compro	0.00	0.00								
Group V SUBTOTALS				992.00	1.95								
Group VI - Driv Site Heaters													
37	H-1A01	16.4 MMBTU/hr/Drill Site 1A Heater	Laloka	743.0	11.07								
38	H-1B01	16.4 MMBTU/hr/Drill Site 1B Heater	Laloka	743.0	11.07								
39	H-2A01	14.5 MMBTU/hr/Drill Site 1C Heater	CE NATCO	743.0	9.01								
40	H-3F01	19.6 MMBTU/hr/Drill Site 1D Heater	CE NATCO	743.0	13.23								
41	H-1B01	16.4 MMBTU/hr/Drill Site 1E Heater	Laloka	0.00	0.00								
42	H-1B02	20.0 MMBTU/hr/Drill Site 1F Heater	GTS Energy	743.0	0.74								
43	H-1F01	14.9 MMBTU/hr/Drill Site 1F Heater	BSEB	743.0	10.03								
44	H-1G01	14.9 MMBTU/hr/Drill Site 1G Heater	BSEB	743.0	10.03								
45	H-1F-1501	16.4 MMBTU/hr/Drill Site 1H Heater	Laloka	743.0	3.53								
46	H-101A	36.8 MMBTU/hr/Drill Site 1J Heater A	Petro Chem	739.4	8.86								
47	H-101B	36.8 MMBTU/hr/Drill Site 1J Heater B	Petro Chem	739.5	8.86								
48	H-1Q01	21.0 MMBTU/hr/Drill Site 1Q Heater	BSEB	743.0	14.19								
49	H-1R01	17.2 MMBTU/hr/Drill Site 1R Heater	BSEB	743.0	11.59								
50	H-1Y01	14.9 MMBTU/hr/Drill Site 1Y Heater	BSEB	0.00	0.00								
Group VI SUBTOTALS				6900.03	112.7								
FACILITY TOTALS					849.3	0.00							

Additional INCINERATOR INFORMATION

H-250 Monthly Solid Waste Throughput (tons): 41.0 12-month (tons): 570.5

H-347 Monthly Solid Waste Throughput (tons): 0.0 12-month (tons): 0.0

Hedburn Monthly Charge Rate (lbs/hr): 0.00

Based on the information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Date:

Reviewed by: Operations Superintendent - Printed Name

Operations Superintendent - Signature
Original: Environmental

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Conocophillips Alaska, Inc
Kuparuk River Unit Central Processing Facility 1 (CPF-1)
Waste Water Treatment Plant
Air Quality Operating Permit Number 267TVP01
Facility Operating Report
JAN-2019

Group No.	Tag No.	Rating/Duty	Monthly Max Charge lb/hr	Run Time (hrs)	Fuel Used (MMCF)	Fuel Used (tons)	Estimated Waste (Cubic Yards)	Estimated Waste (Tons)
Group V Incinerators	H-250	1350 Lb/Hr Waste Incinerator Source 35		721	2.3793	58.3	540	56.3
	H-347	900 Lb/Hr Waste Incinerator Source 36	0 (limit 765/hr)	0	0	0	0	0
			Total Monthly:		2.3793	58.3	540	56.3

H2S Concentration (ppm)

Mean

Auxiliary Fuel

Same as CPF1 Fuel Gas

Reviewed by: Don Willis 2/1/2019

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Send inquiries regarding this report to: n1728@conocophillips.com

ConocoPhillips Alaska, Inc., WWTP, Kuparuk, Alaska

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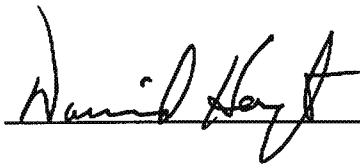
Kuparuk River Unit Central Processing Facility 1 (CPF-1)**Waste Water Treatment Plant****Air Quality Operating Permit Number 267TVP01****Facility Operating Report****FEB-2019**

Group No.	Tag No.	Rating/Duty	Monthly Max Charge lb/hr	Run Time (hrs)	Fuel Used (MMCF)	Fuel Used (tons)	Estimated Waste (Cubic Yards)	Estimated Waste (Tons)
Group V Incinerators	H-250	1350 Lb/Hr Waste Incinerator Source 35		608	2.0064	49.2	379.2	39.5
	H-347	900 Lb/Hr Waste Incinerator Source 36	0 (limit 765/hr)	0	0	0	0	0
			Total Monthly:		2.0064	49.2	379.2	39.5

H2S Concentration (ppm)**Mean****Auxiliary Fuel**

Same as CPF1 Fuel Gas

Reviewed by:



3/1/2019

Return to Kuparuk Environmental Compliance - NSK 61

SCADA report generated on Friday, 01-MAR-2019 07:23:04

ConocoPhillips Alaska, Inc., WWTP, Kuparuk, Alaska

Send inquiries regarding this report to: n1728@conocophillips.com

[*]

Conocophillips Alaska, Inc
Kuparuk River Unit Central Processing Facility 1 (CPF-1)
Waste Water Treatment Plant
Air Quality Operating Permit Number 267TVP01
Facility Operating Report
MAR-2019

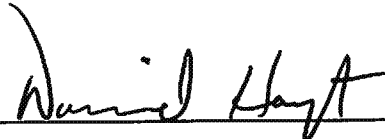
Group No.	Tag No.	Rating/Duty	Monthly Max Charge lb/hr	Run Time (hrs)	Fuel Used (MMCF)	Fuel Used (tons)	Estimated Waste (Cubic Yards)	Estimated Waste (Tons)
Group V Incinerators	H-250	1350 Lb/Hr Waste Incinerator Source 35		592	1.9536	47.9	393.6	41
	H-347	900 Lb/Hr Waste Incinerator Source 36	0 (limit 765/hr)	0	0	0	0	0
			Total Monthly:		1.9536	47.9	393.6	41

H2S Concentration (ppm)

Auxiliary Fuel

Mean

Same as CPF1 Fuel Gas

Reviewed by:  4-1-2019

Return to Kuparuk Environmental Compliance - NSK 61

SCADA report generated on Monday, 01-APR-2019 07:04:13
Send inquiries regarding this report to: n1728@conocophillips.com

ConocoPhillips Alaska, Inc., WWTP, Kuparuk, Alaska

[*]

ConocoPhillips Alaska, Inc.
 Air Quality Operating Permit No. AQ0267TVP01, Rev. 2 (Conditions 10.5 & 10.6)
 Drill Sites 1E and 1J (Combined)
 Well Servicing Equipment Diesel Fuel Use

Date
 From: 1-Jan-19
 Thru: 31-Jan-19

Unit ID No.	Emission Unit Description	Daily Maximum for the Period (gal/day)	Short Term Limit (gal/day) [from Condition 17]	Total per Month (gal)	Rolling 12-month Total (gal/year)	Rolling 12-month Operation Limit (gal/year) [from Condition 16]
61	Well Service Heaters	557	2,700	29,242	160,411	200,000
62	Well Service IC Engines			2,170	36,181	177,800
63	Frac Unit IC Engines	0	20,100	0	0	50,000

Note: The limits shown in this report were "rescinded" when Minor Permit AQ0267MSS06 was issued on March 28, 2014. However, the limits still apply until the ADEC issues a renewed or revised CPF-1 operating permit that incorporates the terms and provisions of Minor Permit AQ0267MSS06.

Approved by:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Reviewed by:

 Date: 20-Apr-2019

ConocoPhillips Alaska, Inc. - Wells Superintendent

ConocoPhillips Alaska, Inc.
Air Quality Operating Permit No. AQ0267TVP01, Rev. 2 (Conditions 10.5 & 10.6)
Drill Sites 1E and 1J (Combined)
Well Servicing Equipment Diesel Fuel Use

Date	
From:	1-Feb-19
Thru:	28-Feb-19

Unit ID No.	Emission Unit Description	Daily Maximum for the Period (gal/day)	Short Term Limit (gal/day) [from Condition 17]	Total per Month (gal)	Rolling 12-month Total (gal/year)	Rolling 12-month Operation Limit (gal/year) [from Condition 16]
61	Well Service Heaters	419	2,700	28,032	151,019	200,000
62	Well Service IC Engines			3,085	36,657	177,800
63	Frac Unit IC Engines	0	20,100	0	0	50,000

Note: The limits shown in this report were "rescinded" when Minor Permit AQ0267MSS06 was issued on March 28, 2014. However, the limits still apply until the ADEC issues a renewed or revised CPF-1 operating permit that incorporates the terms and provisions of Minor Permit AQ0267MSS06.

Approved by:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Reviewed by:

Sam C. Hite 20-Apr-2019
ConocoPhillips Alaska, Inc. - Wells Superintendent Date:

ConocoPhillips Alaska, Inc.
Air Quality Operating Permit No. AQ0267TVP01, Rev. 2 (Conditions 10.5 & 10.6)
Drill Sites 1E and 1J (Combined)
Well Servicing Equipment Diesel Fuel Use

Date	
From:	1-Mar-19
Thru:	31-Mar-19

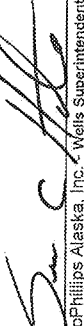
Unit ID No.	Emission Unit Description	Daily Maximum for the Period (gal/day)	Short Term Limit (gal/day) [from Condition 17]	Total per Month (gal)	Rolling 12-month Total (gal/year)	Rolling 12-month Operation Limit (gal/year) [from Condition 16]
61	Well Service Heaters	280	2,700	36,864	175,106	200,000
62	Well Service IC Engines			2,016	35,726	177,800
63	Frac Unit IC Engines	0	20,100	0	0	50,000

Note: The limits shown in this report were "rescinded" when Minor Permit AQ0267MSS06 was issued on March 28, 2014. However, the limits still apply until the ADEC issues a renewed or revised CPF-1 operating permit that incorporates the terms and provisions of Minor Permit AQ0267MSS06.

Approved by:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Reviewed by:


ConocoPhillips Alaska, Inc., Wells Superintendent
Date: 28-Apr-2019

ConocoPhillips Alaska, Inc.
Air Quality Permit No AQ0267TVF01, Rev. 2
Drill Site 1E and 1J
Drilling Rig Fuel Use Permit Conditions 10.5 and 10.6

Date	Nabors YES	Nabors CDR3	Nordic 1		
1/1/2019	N/A	N/A	N/A		
1/31/2019	N/A	N/A	N/A		

Equipment					All Rigs Total (Rolling Yearly Total gal/yr)		12 Month Operational Limit (gal/yr)
Equipment Type	Equipment Use	Description	Rating	Monthly Total	Rig Total for Month		
EUI-D Nabors YES							
58	Generator	Primary/Reserve	#1 Cat 3512B	1101 Kw	0		
58	Generator	Primary/Reserve	#2 Cat 3512B	1101 Kw			
58	Generator	Primary/Reserve	#3 Cat 3412	817 BHP			
Nordic 1							
58	Generator	Primary/Reserve	#1 Cat 3412	700 BHP	0	974	
58	Generator	Primary/Reserve	#2 Cat 3412	700 BHP			
Nabors CDR3							
58	Generator	Primary/Reserve	#1 Cat C-15	610 HP	0		
58	Generator	Primary/Reserve	#2 Cat C-9	369 HP			
58	Generator	Primary/Reserve	#3 Cat C-9	369 HP			
58	Generator	Primary/Reserve	#4 Cat C-15	610 HP	0		
EUI-D Boilers and Heaters							
59	Boilers	Nabors YES Boilers (2)	Kewanee	100 HP	0		
59	Heaters	Nabors YES Heaters (2)	Mohawk	100 HP			
59	Boilers	Nabors CDR3 Boilers (2)	Tioga	2.42 MMbtu/hr			
59	Heaters	Nabors CDR3 Heaters (2)		80 HP	0	6,931	
59	Boilers	Nordic 1 Boiler (2)		4.5 MMbtu/hr			
59	Heaters	Nordic 1 Heater (1)					
EUI-D Rig Camp Engines							
60	Generator	Nabors YES		0	0	0	
60	Generator	Nabors CDR3		0			

Maximum Daily "Primary/Reserve" Fuel Consumption during Month (gals/date):

EUI-D 58 Max Daily Limit: 5,170 gallons (applies after the first 24-months of drilling only)

Reset to zero on April 1, 2006 due to March 24, 2006 permit revision

Greg Hobbs
WELLS EXCELLENCE COMPL & REGULATORY ENGR

Date 4/23/2019

ConocoPhillips Alaska, Inc.
Air Quality Permit No AQ0267TYP01, Rev. 2
Drill Site 1E and 1J
Drilling Rig Fuel Use Permit Conditions 10.5 and 10.6

Date	Nabors 7ES	Nabors CDR3	Nordic 1		
2/1/2019	N/A	2/10/2019	N/A		
2/18/2019	N/A	2/18/2019	N/A		

Equipment					All Rigs Total (Rolling Yearly Total gal/yr)		12 Month Operational Limit (gal/yr)
EU-ID	Type	Equipment Use	Description	Rating	Monthly Total	Rig Total for Month	
EU-ID Nabors 7ES							
58	Generator	Primary/Reserve	#1 Cat 3512B	1101 Kw	0	0	
58	Generator	Primary/Reserve	#2 Cat 3512B	1101 Kw	0		
58	Generator	Primary/Reserve	#3 Cat 3412	817 BHP	0		
Nordic 1							
58	Generator	Primary/Reserve	#1 Cat 3412	700 BHP	0	0	
58	Generator	Primary/Reserve	#2 Cat 3412	700 BHP	0		
Nabors CDR3							
58	Generator	Primary/Reserve	#1 Cat C-15	610 HP	2,763	5,525	
58	Generator	Primary/Reserve	#2 Cat C-9	369 HP	0		
58	Generator	Primary/Reserve	#3 Cat C-9	369 HP	2,762		
58	Generator	Primary/Reserve	#4 Cat C-15	610 HP	0		
EU-ID Boilers and Heaters							
59	Boilers	Nabors 7ES Boilers (2)	Kewanee	100 HP	0	10,094	
59	Heaters	Nabors 7ES Heaters (2)			0		
59	Boilers	Nabors CDR3 Boilers (2)	Mohawk	100 HP	5,170		
59	Heaters	Nabors CDR3 Heaters (2)	Tioga	2,42 MMbtu/hr	4,924	17,025	1,476,000
59	Boilers	Nordic 1 Boiler (2)		80 HP	0		
59	Heaters	Nordic 1 Heater (1)		4,5 MMbtu/hr	0		
EU-ID Rig Camp Engines							
60	Generator	Nabors 7ES			0	0	54400
60	Generator	Nabors CDR3			0		

Maximum Daily "Primary/Reserve" Fuel Consumption during Month (gals./Date):

EUJD 58	Max Daily Limit:	5,170 gallons	(applies after the first 24-months of drilling only)
		962	2/14/2019

Reset to zero on April 1, 2006 due to March 24, 2006 permit revision

Greg Hobbs
WELLS EXCELLENCE COMPLETE & REGULATORY ENGR

Date 4/23/2019

ConocoPhillips Alaska, Inc.
Air Quality Permit No AQ0267TVP01, Rev. 2
Drill Site 1E and 1J
Drilling Rig Fuel Use Permit Conditions 10.5 and 10.6

Date	Nabors 7ES	Nabors CDR3	Nordic 1		
3/1/2019	N/A	N/A	N/A		
3/31/2019	N/A	N/A	N/A		

Equipment Type	Equipment Use	Description	Rating	Monthly Total	Rig Total for Month	All Rigs Total (Rolling Yearly Total gal/yr)	12 Month Operational Limit (gal/yr)
EU-ID Nabors 7ES	Generator	Primary/Reserve	#1 Cat 3512B	1101 Kw	0	0	3,159,000 (for 1st 24 months, thereafter) March 26, 2006 is the end of the 24 month period
	Generator	Primary/Reserve	#2 Cat 3512B	1101 Kw	0		
	Generator	Primary/Reserve	#3 Cat 3412	817 BHP	0		
	Generator	Primary/Reserve	#1 Cat 3412	700 BHP	0		
EU-ID Nabors CDR3	Generator	Primary/Reserve	#2 Cat 3412	700 BHP	0	0	6,499
	Generator	Primary/Reserve	#1 Cat C-15	610 HP	0		
	Generator	Primary/Reserve	#2 Cat C-9	369 HP	0		
	Generator	Primary/Reserve	#3 Cat C-9	369 HP	0		
EU-ID Nabors and Heaters	Generator	Primary/Reserve	#4 Cat C-15	610 HP	0	0	17,025
	Boilers	Nabors 7ES Boilers (2)	Kewanee	100 HP	0		
	Boilers	Nabors 7ES Heaters (2)	Mohawk	100 HP	0		
	Boilers	Nabors CDR3 Boilers (2)	Toga	2.42 MMbtu/hr	0		
EU-ID Rig Camp Engines	Boilers	Nabors CDR3 Heaters (2)	80 HP	0	0	0	1,476,000
	Boilers	Nordic 1 Boiler (2)	4.5 MMbtu/hr	0			
	Heaters	Nordic 1 Heater (1)					
	Heaters						
EU-ID	Generator	Nabors 7ES		0	0	0	54,400
	Generator	Nabors CDR3		0			

Maximum Daily "Primary/Reserve" Fuel Consumption during Month (gals/date):

EU-ID 58 Max Daily Limit: 5,170 gallons (applies after the first 24-months of drilling only)

Reset to zero on April 1, 2006 due to March 24, 2006 permit revision

Greg Hobbs
WELLS EXCELLENCE COMPL & REGULATORY ENGR

Date 4/23/2019

Attachment 3

Monthly and 12-Month Rolling Total Actual Emission Summary

ConocoPhillips Alaska, Inc.
Total Monthly Actual Emissions Summary
Kuparuk Central Production Facility No. 1
2019

Version 2019.5

Turbines - Units 1 - 3 and 8 - 13

Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Year to Date Total (tons)
NO _x	69.7	66.9	62.9										199.5
CO	17.1	16.3	15.3										48.8
VOC	0.44	0.42	0.39										1.2
SO ₂	3.7	3.7	3.3										10.8
PM ₁₀	2.9	2.7	2.6										8.2

Turbines - Units 1 - 3

Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Year to Date Total (tons)
NO _x	46.7	48.4	44.8										140.0

Heaters - Units 16, 37 - 41, 43 - 45, and 48 - 50

Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Year to Date Total (tons)
NO _x	6.8	6.1	6.7										19.6
CO	1.2	1.1	1.2										3.5
SO ₂	1.1	1.0	1.1										3.2
PM ₁₀	0.17	0.15	0.16										0.48

Incinerator - Unit 36

Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Year to Date Total (tons)
NO _x	0.0	0.0	0.0										0.0
CO	0.0	0.0	0.0										0.0
VOC	0.00	0.00	0.00										0.0
SO ₂	0.00	0.00	0.00										0.0
PM ₁₀	0.0	0.0	0.0										0.0

													Permit Limit
H ₂ S ppmv in Lift Gas Tie Line	113.0	118.6	111.7										200 ppmv (24-hr avg)
H ₂ S ppmv in Flared Gas	133.7	103.8	109.5										---
Sulfur Content in LEPD (wt%)	0.107	0.109	0.111										0.5 wt%

ConocoPhillips Alaska, Inc.
Total Monthly Actual SO₂ Emissions Summary
Kuparuk DS1E/1J Drill Rig Heaters/Boilers, Production Heaters, Portable Flare
2019

Version 2019.5

Unit	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Year to Date Total (tons)
EU ID 59 Drill Rig Heaters & Boilers	0.0	0.07	0.0										0.07
EU IDs 42, 46, & 47 Production Heaters	0.17	0.16	0.17										0.51
EU ID 34 Portable Flare	0.00	0.00	0.00										0.00

DS1E & DS1J Emission Units

H ₂ S ppmv in Lift Gas Tie Line	113.0	118.6	111.7									
Sulfur Content in ULSD (wt%)	0.000300	0.000300	0.000300									
Sulfur Content in LEPD (wt%)	0.107	0.109	0.111									

ConocoPhillips Alaska, Inc.
12-Month Running Total Actual Emissions Summary
Kuparuk Central Production Facility No. 1
2019

Version 2019.5

Turbines - Units 1 - 3 and 8 - 13

12-Month Period Ending:													
Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
NO _x	891.7	888.4	871.8										2,046 tons
CO	218.0	217.2	213.2										612 tons
VOC	5.6	5.6	5.5										7.5 tons
SO ₂	47.6	48.1	46.8										109 tons
PM ₁₀	36.5	36.4	35.7										50 tons

Turbines - Units 1 - 3

12-Month Period Ending:													
Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
NO _x	628.3	625.6	613.4										824 tons

Heaters - Units 16, 37 - 41, 43 - 45, and 48 - 50

12-Month Period Ending:													
Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
NO _x	77.1	77.3	77.3										124 tons
CO	13.9	13.9	13.9										44 tons
SO ₂	12.5	12.7	12.6										33 tons
PM ₁₀	1.9	1.9	1.9										14 tons

Incinerator - Unit 36

12-Month Period Ending:													
Pollutant	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
NO _x	0.0	0.0	0.0										8 tons
CO	0.0	0.0	0.0										17 tons
VOC	0.0	0.0	0.0										5.1 tons
SO ₂	0.0	0.0	0.0										4 tons
PM ₁₀	0.0	0.0	0.0										12 tons

H ₂ S ppmv in CPF-1 Fuel Gas (12-mth avg.)	112.8	114.6	113.6										200 ppmv
Sulfur Content in LEPD (wt%) Monthly analytical results	0.107	0.109	0.111										0.5 wt%

ConocoPhillips Alaska, Inc.
12-Month Running Total Actual SO₂ Emissions Summary
Kuparuk DS1E/1J Drill Rig Heaters/Boilers, Production Heaters, Portable Flare
2019

Version 2019.5

12-Month Period Ending:													
Unit	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
EU ID 59 Drill Rig Heaters & Boilers	0.06	0.13	0.13										N/A
EU IDs 42, 46, & 47 Production Heaters	2.0	2.1	2.0										N/A
EU ID 34 Portable Flare	0.0	0.0	0.0										N/A
Total	2.1	2.2	2.1										35 tons

DS1E & DS1J Emission Units

H ₂ S ppmv in Lift Gas Tie Line Monthly Analytical Results	113.0	118.6	111.7										275 ppmv (instantaneous)
Sulfur Content in ULSD (wt%) Monthly analytical results	0.000300	0.000300	0.000300										0.0015 Wt %
Sulfur Content in LEPD (wt%) Monthly analytical results	0.107	0.109	0.111										0.15 Wt %

ConocoPhillips Alaska, Inc.
12-Month Running Total Actual VOC Emissions Summary
Kuparuk DS1E/1J Temporary Crude Oil Storage Tanks (EU ID 56)
2019

Version 2019.5

12-Month Period Ending:													
Location	Jan (tons)	Feb (tons)	Mar (tons)	Apr (tons)	May (tons)	Jun (tons)	Jul (tons)	Aug (tons)	Sep (tons)	Oct (tons)	Nov (tons)	Dec (tons)	Permit Limit (consecutive 12-month)
DS1E	0.000	0.000	0.000										N/A
DS1J	10.544	10.544	10.544										N/A
Total	10.544	10.544	10.544										34 tons

ConocoPhillips Alaska, Inc.
Stationary Source Total Fuel Consumption Summary
Kuparuk Central Production Facility No. 1
TVP01 Permit Condition 10.4
2019

Version 2019.5

Unit	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Year to Date Total
Group I Gas Turbines (IDs 1-14) (MMSCF)	726.7	663.3	664.5										2,054.5
Group I Gas Turbines (IDs 1-14) (Gallons)	0.0	0.0	0.0										0.0
Group II Heaters (IDs 15-18) (MMSCF)	22.3	19.9	20.9										63.1
Group II Heaters (IDs 15-18) (Gallons)	0.0	0.0	0.0										0.0
Group III Diesel Fired Equipment (IDs 19-28) (Gallons)	33.2	0.0	0.0										33.2
Group IV Flares (IDs 29-34) (MMSCF)	56.1	48.0	49.3										153.5
Group V Incinerators (IDs 35-36) (MMSCF)	2.4	2.0	2.0										6.3
Group VI Drill Site Heaters (IDs 37-50) (MMSCF)	112.6	101.8	112.7										327.1
Drill Rig Engines (ID 58) (Gallons)	0.0	5,525.0	0.0										5,525.0
Drill Rig Htrs and Boilers (ID 59) (Gallons)	0.0	10,094.0	0.0										10,094.0
Drill Rig Camp Engines (ID 60) (Gallons)	0.0	0.0	0.0										0.0

Attachment 4

Copies of Excess Emission/Permit Deviation Reports Not Previously Submitted to ADEC during the reporting period

None

Attachment 5

Copies of Excess Emission/Permit Deviation Reports Previously Submitted during the reporting period

March 12: Permit Deviation for EU 56

March 12: Permit Deviation for 4Q18 Operating Report



Brad Broker/Catie Coursen
Environmental Coordinator
P.O. Box 196105
Anchorage, AK 99519-6105
(907) 659-7242 (phone)
(907) 659-7712 (fax)
n1037@conocophillips.com

March 12, 2019

Certified Mail
Return Receipt Requested
7016 1370 0000 0848 9923

Attn: Compliance Technician
Air Quality Management Division
Alaska Department of Environmental Conservation
610 University Avenue
Fairbanks, Alaska 99709

Subject: Permit Deviation – Flowback Supporting Information Omission
Kuparuk Central Production Facility No.1
Permit No. AQ0267TVP01 Rev. 2, 8 August 2007

The ConocoPhillips Alaska, Inc. (COPA) Operating Report (OR) for the Kuparuk Central Production Facility #1 (CPF-1) reporting period ending September 30, 2018 errantly omitted flowback supporting information as required by the operating permit.

Please find the associated Permit Deviation Report for this omission attached. The missing information has been submitted to the Department under separate cover.

If you have any questions or need additional information regarding this report, please contact us at n1037@conocophillips.com or by phone at (907) 659-7242.

Sincerely,

Brad Broker/Catie Coursen
Environmental Coordinator

Attachments

cc: Compliance Technician, Fairbanks

dec.aq.airreports@alaska.gov

Section 20. ADEC Notification Form

Fax this form to: (907) 451-2187

Telephone: (907) 451-5173

ConocoPhillips Alaska, Inc.

Company Name

Kuparuk Central Production Facility #1

Facility Name

Reason for notification:

☐ **Excess Emissions**

If you checked this box

Fill out section 1

☒ **Other Deviation from Permit Condition**

If you checked this box

fill out section 2

When did you discover the Excess Emissions or Other Deviation:

Date: 3/4/2019

Time: 16:30

Section 1. Excess Emissions

(a) Event Information (Use 24-hour clock):

START Time:

END Time:

Duration (hr:min):

Total:

(b) Cause of Event (Check all that apply):

☐ START UP

☐ UPSET CONDITION

☐ CONTROL EQUIPMENT

☐ SHUT DOWN

☐ SCHEDULED MAINTENANCE

☐ OTHER

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

Permit Condition	Limit	Emissions Observed

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

<u>Source ID No.</u>	<u>Source Name</u>	<u>Description</u>	<u>Control Device</u>
56	N/A	Temporary Crude Oil Storage Tanks	N/A

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

<u>Permit Condition</u>	<u>Potential Deviation</u>
42.3 The Permittee shall include with each operating report under condition 88: a. the monthly VOC emissions estimated in condition 42.2 at DS1E and DS1J and the 12 consecutive month VOC emissions, for each calendar month in the reporting period; b. the input and output from simulation models and software; and c. all calculations and assumptions used.	CPAI did not submit flowback simulation model inputs, outputs, and calculations and assumptions used in EU ID 56 VOC emission estimates reported in Attachment 7 of the 3Q 2018 operating report for flowbacks to temporary crude oil storage tanks that occurred in July and September 2018.
88.1 The operating report must include all information required to be in operating reports by other conditions of this permit.	CPAI did not include in the 3Q 2018 operating report the information required by Conditions 42.3b and 42.3c.
90 The Permittee must comply with each permit term and condition.	CPAI did not comply with each permit term and condition.

(c) Corrective Actions:

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

A supplement to the previously submitted 3Q 2018 operating report will be submitted to ADEC under separate cover.

Documentation for future well maintenance flowback events will more clearly identify the need for inclusion in the appropriate operating report.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Dennis Melton

Printed Name:



Signature:

3/12/2019

Date:



Brad Broker/Catie Coursen
Environmental Coordinator
P.O. Box 196105
Anchorage, AK 99519-6105
(907) 659-7242 (phone)
(907) 659-7712 (fax)
n1037@conocophillips.com

March 12, 2019

Certified Mail
Return Receipt Requested
7016 1370 0000 0848 9916

Attn: Compliance Technician
Air Quality Management Division
Alaska Department of Environmental Conservation
610 University Avenue
Fairbanks, Alaska 99709

Subject: Permit Deviation Report Submitted with 4Q 2018 Operating Report
Kuparuk Central Production Facility No.1
Permit No. AQ0267TVP01 Rev. 2, 8 August 2007

The ConocoPhillips Alaska, Inc. (COPA) Operating Report (OR) for the Kuparuk Central Production Facility #1 (CPF-1) reporting period ending December 31, 2018 included a Permit Deviation (PD) report for failure to submit NSPS Subpart J and NSPS Subpart GGG semi-annual reports covering the period Jan – Jun 2018 to the Department at the time of submittal to EPA (July 27, 2018) and not including these reports as attachments to the 3Q 2018 OR. After submittal of the PD report in the OR, a corrected PD report was submitted on February 12, 2019 that identified additional permit conditions that should have been included on the original PD report.

During a routine annual compliance certification audit, the PD report submitted to the Department with the 4Q 2018 OR was found to have omitted the Date of Deviation as required by condition 88.2 for Excess Emission and Permit Deviation Reports that occurred during the reporting period, but have not been previously submitted to the Department. The form contained in Section 20 of the CPF1 permit that is normally used for PD reporting does not contain a location to indicate the Date of Deviation. Because the PD was submitted with the OR, condition 88.2 was determined to apply to the submittal.

Attached is a new PD report that describes the deviation identified in the reporting process. A second correction to the PD report for the failure to submit NSPS Subpart J and NSPS Subpart GGG reports to the Department at the time of submittal to EPA has been submitted to the Department separately as a supplement to the Fourth Quarter OR.

If you have any questions or need additional information regarding this report, please contact us at n1037@conocophillips.com or by phone at (907) 659-7242.

Sincerely,

Brad Broker/Catie Coursen
Environmental Coordinator

Attachments

cc: Compliance Technician, Fairbanks

dec.aq.airreports@alaska.gov

Section 20. ADEC Notification Form

Fax this form to: (907) 451-2187 Telephone: (907) 451-5173

ConocoPhillips Alaska, Inc.

Company Name

Kuparuk Central Production Facility #1

Facility Name

Reason for notification:

☐ **Excess Emissions**

If you checked this box

Fill out section 1

☒ **Other Deviation from Permit Condition**

If you checked this box

fill out section 2

When did you discover the Excess Emissions or Other Deviation:

Date: 3/6/2019 Time: 16:00

Section 1. Excess Emissions

(a) Event Information (Use 24-hour clock):

START Time:

END Time:

Duration (hr:min):

Total:

(b) Cause of Event (Check all that apply):

☐ START UP

☐ UPSET CONDITION

☐ CONTROL EQUIPMENT

☐ SHUT DOWN

☐ SCHEDULED MAINTENANCE

☐ OTHER

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

Permit Condition	Limit	Emissions Observed

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No. Source Name Description Control Device

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

Permit Condition	Potential Deviation
88.1 The operating report must include all information required to be in operating reports by other conditions of this permit.	CPAI did not include in the 4Q 2018 operating report all of the information required by Condition 88.2a.
88.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 88.1, either a. The Permittee shall identify (i) the date of the deviation; (ii) the equipment involved; (iii) the permit condition affected; (iv) a description of the excess emissions or permit deviation; and (v) any corrective action or preventative measures taken and the date of such actions; or	The Permit Deviation Report submitted by CPAI on 2/12/2019 did not contain the date of the deviation. (The 2/12/19 PD report was about not attaching a copy of the Jan – Jun 2018 semi-annual NSPS Subparts J and GGG reports to the 3Q 2018 Operating Report.)
90 The Permittee must comply with each permit term and condition.	CPAI did not comply with each permit term and condition.

(c) Corrective Actions:

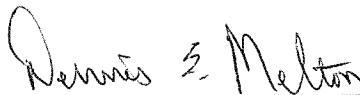
Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

A corrected Excess Emission / Permit Deviation Report has been submitted to the Department under separate cover as part of an amendment to the 4Q 2018 Operating Report. An Excess Emission / Permit Deviation Report template was created on 3/6/2019 to include all required information for future use.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Dennis Melton

Printed Name:



Signature:

3/12/2019

Date:

Attachment 6

Copies of Method 9 Opacity Observations during the reporting period

NONE

Attachment 7

1E/1J VOC Emissions from EU ID 56 with Inputs and Outputs

Operator's Gas Venting Logsheet
CPF1 ORL 267CP02
DS 1E / 1J
Jan-19

Date/Time Start	Date/Time Finish	Well/Area	Fluid ID	Total Vol Crude (BBL)	Est Gas Vol Vented MCF	Est VOC Tons	Comments/Description
N/A	N/A	1E	N/A	0.0	0.0	0.00	No gas venting from 1E West Sak wells during this month
N/A	N/A	1J	N/A	0.0	0.0	0.00	No gas venting from 1J West Sak wells during this month

Monthly Total VOC's 0.000

Prior 11 months rolling Cumulative Volume = 10.600

Rolling 12 month cumulative Total = 10.600

Rolling 12 month VOC Limit: 34 Tons

Production Engineer:

[Signature]
Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

PREVIOUS VOC'S FROM INITIAL OBM FLOWBACKS HAVE BEEN REMOVED PER ADEC

DSO Responsibility: Notify CPF1 Production Engineer of event description, duration and liquid volumes within 24 hours
Forward to CPF1 Production Engineer at the end of each month for final MCF and VOC calculation

Operator's Gas Venting Logsheet
CPF1 ORL 267CP02
DS 1E / 1J
Feb-19

Date/Time Start	Date/Time Finish	Well/Area	Fluid ID	Total Vol Crude (BBL)	Est Gas Vol Vented MCF	Est VOC Tons	Comments/Description
N/A	N/A	1E	N/A	0.0	0.0	0.00	No gas venting from 1E West Sak wells during this month
N/A	N/A	1J	N/A	0.0	0.0	0.00	No gas venting from 1J West Sak wells during this month

Monthly Total VOC's 0.000

Prior 11 months rolling Cumulative Volume = 10.600

Rolling 12 month cumulative Total = 10.600

Rolling 12 month VOC Limit: 34 Tons

Production Engineer:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

PREVIOUS VOC'S FROM INITIAL OBM FLOWBACKS HAVE BEEN REMOVED PER ADEC

DSO Responsibility: Notify CPF1 Production Engineer of event description, duration and liquid volumes within 24 hours
Forward to CPF1 Production Engineer at the end of each month for final MCF and VOC calculation

Operator's Gas Venting Logsheet
CPF1 ORL 267CP02
DS 1E / 1J
Mar-19

Date/Time Start	Date/Time Finish	Well/Area	Fluid ID	Total Vol Crude (BBL)	Est Gas Vol Vented MCF	Est VOC Tons	Comments/Description
N/A	N/A	1E	N/A	0.0	0.0	0.00	No gas venting from 1E West Sak wells during this month
N/A	N/A	1J	N/A	0.0	0.0	0.00	No gas venting from 1J West Sak wells during this month

Monthly Total VOC's 0.000

Prior 11 months rolling Cumulative Volume = 10.600

Rolling 12 month cumulative Total = 10.600

Rolling 12 month VOC Limit: 34 Tons

Production Engineer: _____

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

PREVIOUS VOC'S FROM INITIAL OBM FLOWBACKS HAVE BEEN REMOVED PER ADEC

DSO Responsibility: Notify CPF1 Production Engineer of event description, duration and liquid volumes within 24 hours
Forward to CPF1 Production Engineer at the end of each month for final MCF and VOC calculation

Attachment 8

EU 58, 59, 61 and 62 Fuel Use Corrections

Month	Fuel Use
<i>EU ID 58</i>	
November 2016	0.0
December 2016	0.0
June 2017	0.0
October 2017	0.0
<i>EU ID 59</i>	
November 2016	0.0
December 2016	0.0
June 2017	0.0
October 2017	0.0
<i>EU ID 61</i>	
October 2017	17,807.0
December 2017	4,423.0
<i>EU ID 62</i>	
October 2017	1,224.0
December 2017	1,984.0

Attachment 9

1E/1J VOC Emissions from EU ID 56 Corrections

Jun-18

Monthly Total VOC's	0.000
---------------------	-------

Rolling 12 month cumulative Total = 0.000

Production Engineer:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

DSO Responsibility: Notify CPF1 Production Engineer of event description, duration and liquid volumes within 24 hours
Forward to CPF1 Production Engineer at the end of each month for final MCF and VOC calculation